

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DIVISION OF AUSTIN**

PIERRE BRAZEAU, Individually and on
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER,
ERIC J. SCHOEN, JAMES W. KUPIEC,
NADAV FRIEDMANN and MICHAEL
MARSMAN,

Defendants.

Case No. 1:21-cv-00751-RP

CLASS ACTION

**[PROPOSED] ORDER CONSOLIDATING
RELATED ACTIONS, APPOINTING LEAD
PLAINTIFF, AND APPROVING
SELECTION OF COUNSEL**

WANDA NEWELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER,
and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760-RP

KATLYN K. REIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER,
ERIC J. SCHOEN, JAMES W. KUPIEC,
NADAV FRIEDMANN, and MICHAEL
MARSMAN,

Defendants.

Case No. 1:21-cv-00856-RP

WHEREAS, the above-captioned securities class actions have been filed against Cassava Sciences, Inc., et al. (collectively “Defendants”), alleging violations of the federal securities laws;

WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)(i), Plaintiff Pierre Brazeau in the above-captioned first-filed action caused notice to be issued to potential class members of the action on August 27, 2021 informing them of their right to move to serve as lead plaintiff within 60 days of the date of the issuance of said notice;

WHEREAS, on October 26, 2021, Steve Burmeister moved the Court: (1) for consolidation of the three related actions; (2) for appointment as Lead Plaintiff; and (3) to approve of his selection of Kahn Swick & Foti, LLC as Lead Counsel and Fears Nachawati, PLLC as Liaison Counsel;

WHEREAS, the PSLRA provides, *inter alia*, that the most-adequate plaintiff to serve as lead plaintiff is the person that has either filed a complaint or has made a motion in response to a notice and has the largest financial interest in the relief sought by the Class and satisfies the pertinent requirements of FED. R. CIV. P. 23;

WHEREAS, the Court finding that Mr. Burmeister has the largest financial interest in this action and *prima facie* satisfies the typicality and adequacy requirements of FED. R. CIV. P. 23. *See* 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I);

IT IS HEREBY ORDERED THAT:

1. The *Brazeau*, *Newell*, and *Rein* actions are hereby consolidated under the first-filed action;

2. Pursuant to Section 21D(a)(3)(B) of the Exchange Act, 15 U.S.C. §78u-4(a)(3)(B), Mr. Burmeister is appointed as Lead Plaintiff of the class as he has the largest financial interest in this litigation and otherwise satisfies the requirements of FED. R. CIV. P. 23.

3. Mr. Burmeister's selection of counsel is approved. Kahn Swick & Foti, LLC is therefore appointed as Lead Counsel and Fears Nachawati, PLLC is appointed as Liaison Counsel.

4. Lead Counsel shall manage the prosecution of this litigation. Lead Counsel is to avoid duplicative or unproductive activities and is hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) to prepare the case for trial; and (5) to engage in settlement negotiations on behalf of the Lead Plaintiff and Class.

Dated: _____

Hon. Judge Robert L. Pitman
United States District Judge